



Valley Telephone Cooperative    Copper Valley Telephone    Valley Connections, LLC

Valley Telecommunications - Internet - Business Systems

**Annual Reporting for High-Cost Recipients  
47 C.F.R. §54.313(a)(2) through (a)(6) and (h)  
Valley Telephone Cooperative, Inc. -AZ  
and Copper Valley Telephone, Inc.  
Study Area 452176**

June 19, 2012

Ms. Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, D.C. 20554

Ms. Karen Majcher  
Vice President – High Cost Low Income Division  
Universal Service Administrative Company  
2000 L Street NW, Suite 200  
Washington, D.C. 20036

RE: WC Docket No. 10-90: Annual Reporting Requirements for High-Cost Recipients §54.313 (a)(2) through (a)(6) and (h)

Pursuant to Section 54.313(a)(2) through (a)(6) and (h) of the Federal Communications Commission's rules, enclosed are the 2012 annual reporting requirements and certifications for Valley Telephone Cooperative, Inc.- AZ, Study Area Code 452176 (which includes Copper Valley Telephone). The Companies are state-designated ETCs, and as such, are voluntarily submitting to the Commission relevant information for §54.313 (a)(2) through (a)(4).

Should you have any questions, please contact me via email at [virgil.barnard@vtc.net](mailto:virgil.barnard@vtc.net) or by phone at 520-384-8932.

Sincerely,

Virgil Barnard  
Contracts & Compliance Manager

Enclosures

Cc: Arizona Corporation Commission

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**OUTAGE REPORTING – §54.313 (a)(2)**

Detailed information on any outage in the prior calendar year, as that term is defined in 47 C.F.R. 4.5, of at least 30 minutes in duration for each service area in which an eligible telecommunications carrier is designated for any facilities it owns, operates, leases, or otherwise utilizes that potentially affect (i) At least ten percent of the end users served in a designated service area; or (ii) A 911 special facility, as defined in 47 C.F.R. 4.5(e). 47 C.F.R. §54.313(a)(2).

Detailed Outage Information for 2011						
Date of Outage	Time of Outage	Description of Outage and Resolution	Particular Services Affected	Geographic Areas Affected	Steps Taken to Prevent Future Recurrences	Number of Customers Affected
No Outages meet Criteria						

**UNFULFILLED SERVICE REQUESTS – §54.313(a)(3)**

The number of requests for service from potential customers within the recipient's service areas that were unfulfilled during the prior calendar year. The carrier shall also detail how it attempted to provide service to those customers.

The Companies (Study Area 452176) did not have any unfulfilled or delayed requests for telephone service in 2011. There should never be any unfulfilled requests for telephone service from potential customers. However, the more expensive service requests may sometimes be delayed to allow budgeting for the expenditure in the next budget year.

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The Companies evaluate their ability to provide telephone service to the customer by studying the customer location to see what the distance is from our existing service. If the cost of extending the line to the customer is under the line extension threshold then it is scheduled for immediate construction. If the cost exceeds the line extension threshold, the construction project is added to the construction work plan budget for completion as soon as feasible the next year. The only reason any requests for telephone service should be delayed beyond this one year timeframe would be when construction right of way permits delay the process.

The Companies did not formally track the unfulfilled requests for broadband service in 2011 but have implemented tracking in 2012. There were few requests for broadband service from potential customers that were not possible to fulfill with wire-line service during 2011. There is no reason to ever fail to provide broadband service to any requesting subscriber. When it is not economically feasible to provide wire-line broadband service we are able to offer satellite broadband because we are a reseller of the Exede (ViaSat) satellite service.

The Companies evaluate their ability to provide wire-line based broadband service to the customer by studying the customer location to see what the distance is from our broadband delivery equipment. Only if the customer location is outside the distance limitations of the equipment's ability can a request be considered unfulfillable. Generally, the only way to extend the distance of availability is to place additional fiber optic cable and a carrier system within closer proximity to the customer, this is prohibitively expensive for a single customer. The area is surveyed to identify any other customers in proximity that may have a desire for the service in order to spread the cost of the additional equipment. If a sufficient number of customers desire service then the construction project is placed in the construction work plan and budgeted for at the earliest opportunity. If not, then the customer is informed of the availability of Exede (ViaSat) satellite broadband service that is resold by the Companies.

**NUMBER OF COMPLAINTS PER 1,000 CONNECTIONS – §54.313(a)(4)**

The number of complaints per 1,000 connections (fixed or mobile) in the prior calendar year.

During calendar year 2011, the Companies received no complaints.

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**§54.313(a)(5) – COMPLIANCE WITH SERVICE QUALITY STANDARDS AND CONSUMER PROTECTION RULES**

*Service Quality Standards and Consumer Protection Rules Annual Certification*

Steven D. Metts	CEO/GM	Valley Telephone Cooperative, Inc. and Copper Valley Telephone, Inc.
Printed Name of Officer	Title of Officer	Company Names

I am authorized to provide this certification on behalf of the Companies. I hereby certify that the Companies are in compliance with applicable service quality standards and consumer protection rules.

Executed on

June 19, 2012

Date

Signature



Steven D. Metts

Printed/Typed Name

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**§54.313(a)(6) – ABILITY TO FUNCTION IN EMERGENCY SITUATIONS**

*Ability to Function in Emergency Situations Annual Certification*

Steven D. Metts	CEO/GM	Valley Telephone Cooperative Inc. and Copper Valley Telephone, Inc.
Printed Name of Officer	Title of Officer	Company Names

I am authorized to provide this certification on behalf of the Companies. I hereby certify that the Companies are capable of functioning in emergency situations. The Companies have a reasonable amount of back-up power to ensure functionality without an external power source, are able to reroute traffic around damaged facilities, and are capable of managing traffic spikes resulting from emergency situations.

Executed on

June 19, 2012

Date

Signature



Steven D. Metts

Printed/Typed Name

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**ADDITIONAL VOICE RATE DATA – §54.313(h)**

All incumbent local exchange carrier recipients of high-cost support must report all rates for residential local service, as well as state fees as defined pursuant to §54.318(e) of this subpart, that are below the local urban rate floor as defined in §54.318 of this subpart, and the number of lines for each rate specified. Carriers shall report lines and rates in effect as of June 1.

As of June 1, 2012, the Companies' rates for residential local service, including state fees as defined pursuant to §54.318(e), were all above the local urban rate floor of ten dollars.